Communications
Workers of America
AFL TO DEC

501 Third Street, N.W Washington, D.C 20001-2797 202/434-1100 Fax 202/434-1279 ORIGINAL OR LATE FILED

No. of Flories rec'd_ . No. ABODE

RECEIVED & INSPECTED

SEP 2 7 2002

FCC - MAILROOM

September 10, 2002

Ms. Marlene H. Dortch, Secretary Federal Communications Commission 44° Twelfth Street, S.W. Washington, D.C. 20554

RE: Ex Parte Notice

CC Docket Nos. 02-33, 95-20, 98-10. In the Matter of Appropriate Framework for Broadband Access to the Internet over Wireline Facilities; Universal Service Obligations of Broadband Providers; Computer III Further Remand Proceedings: Bell Operating Company Provision of Enhanced Services; 1998 Biennial Regulatory Review – Review of Computer III and ONA Safeguards and Requirements

CC Docket No. 01-337. In the Matter of Review of Regulatory Requirements for Incumbent LFC Broadband Telecommunications Services

CC Dockets Nos. 01-338, 96-98, 98-147. In the Matter of Review of Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers; Implementation of the Local Competition Provisions of the Telecommunications Act of 1996; Deployment of Wireline Services Offering Advanced Telecommunications Capability

Dear Ms. Dortch:

On September 10, 2002, Morton Bahr, President of the Communications Workers of America, maded the attached study. *Putting Broadband on High Speed: New public policies to encourage rapid deployment* by Dr. Stephen Pociask, to Chairman Michael Powell, Commissioners Kathleen Abernathy, Kevin Martin, and Michael Copps, and the attached list of FCC staff.

The study documents the important social and economic benefits of broadband deployment, including its job creating potential. The report analyzes the economic impact of the divergent regulatory regimes for cable and wireline broadband technologies and makes the case for regulatory parity, arguing that regulatory parity will send the correct signals to capital markets and thereby encourage investment and broader deployment.

Sincerely

Debbie Goldman, Research Economist

Communications Workers of America

oc Attached List

Tipe(Neime)	Las Name
Donaid	Abelson
Kathleen	Abernathy
Monia	Baghadi
Robert	Baker
Tom	Beers
Scott	Bergman
John	Berresford
Jim	Bird
Ellen	Blackler
Catherine	Bohigian
Mathew	Brill
Steven	Broeckaert
David	Brown
Cynthia	Bryant
Ellen	Burton
Chery	Callaghan
Robert	Cannon
Michelle	Сагеу
Jeffrey	Carlisle
Jared	Carlson
Emmitt	Carlton
William	Caton
Anita	Cheng
Rick	Chessen
Lisa	Choi
Martha	Contee
Gregory	Cooke
Michaei	Copps
Paul	D'Ari
Scott	Delacourt
Monica	Desai
William	Dever
Royce	Dickens
Kyle	Dixon
Marlene	Dortch
Erin	Dozier
Jerry	Duvall
Margaret	Egler
Eric	Einhorn
Barbara	Esbin
Gerald	Faulhaber
Sam	Feder
Alan	Feldman
Kenneth	Ferree
Claudia	Fox
Fatina	Franklin

First Name	
Suzan	Freidman
David	Furth
Paul	Gallant
Marcia	Glauberman
Jordan	Goldstein
Anna	Gomez
Eloise	Gore
Marjorie	Greene
Diane	Griffin
Sheldon	Guttmann
Kathleen	Ham
Katherine	Harris
Collen	Heitkamp
Judith	Herman
Leora	Hochstein
Daniel	Hodes
Emily	Hoffner
Roger	Holberg
Thomas	Horan
Cathy	Hsu
Jane	Jackson
Jamila Bess	Johnson
Nandan	Joshi
Radhika	Karmarkar
Andrea	Kelly
Linda	Kinney
Lauren	Kravetz
Adam	Krinsky
William W.	Kunze
Susan	Launer
Belford	Lawson
Richard	Lerner
Jonathan	Levy
Christopher	Libertelli
Elizabeth	Lyle
Marsha	MacBride
Jane	Mago
William	Maher
Scott	Marcus
Paul	Margie
Daniel	Margolis
Stephen	Markendorff
Kevin	Martin
Carol	Mattey
Pamela	Megna
Gary	Michaels

Robert Mirelson Kris Monteith Mary Beth Murphy Janice Myles Amy Nathan Thomas Navin Roger Noel John Norton Barry Ohlson Brent Olson Karen Onyeije Ronald Parver Robert Pepper Michael Perko Larry Povich Michael Powell Kelly Quinn Robert Ratcliffe Linda Ray John Rogovin Jessica Rosenworcel Jacquelynn Ruff Daniel Rumelt David Sappington William Scher James Schlichting Katherine Schroder Blaise Scinto Catherine Seidel Mark Seifert Linda Senecal Royce Sherlock Daniel Shiman Janet Sievert Louis Sigalos Jenifer Simpson James Smith K Dane Snowden David Solomon Thomas Spavins John Stanley Jerome Stanshine Jeffrey Steinberg Ann Stevens Donald Stockdale Karen Peltz Strauss		a last Name
Mary Beth Murphy Janice Myles Amy Nathan Thomas Navin Roger Noel John Norton Barry Ohlson Brent Olson Karen Onyeije Ronald Parver Robert Pepper Michael Perko Larry Povich Michael Powell Kelly Quinn Robert Ratcliffe Linda Ray John Rogovin Jessica Rosenworcel Jacquelynn Ruff Daniel Rumelt David Sappington William Scher James Schlichting Katherine Schroder Blaise Scinto Catherine Seidel Mark Seifert Linda Senecal Royce Sherlock Daniel Shiman Janet Sievert Louis Sigalos Jenifer Simpson James Smith K Dane Snowden David Solomon Thomas Spavins John Stanley Jerome Stanshine Jeffrey Steinberg Ann Stevens Donald Stockdale	Robert	Mirelson
Janice Myles Amy Nathan Thomas Navin Roger Noel John Norton Barry Ohlson Brent Olson Karen Onyeije Ronald Parver Robert Pepper Michael Perko Larry Povich Michael Powell Kelly Quinn Robert Ratcliffe Linda Ray John Rogovin Jessica Rosenworcel Jacquelynn Ruff Daniel Rumelt David Sappington William Scher James Schlichting Katherine Schroder Blaise Scinto Catherine Seidel Mark Seifert Linda Senecal Royce Sherlock Daniel Shiman Janet Sievert Louis Sigalos Jenifer Simpson James Smith K Dane Snowden David Solomon Thomas Spavins John Stanley Jerome Stanshine Jeffrey Steinberg Ann Stevens Donald Stockdale		
Amy Nathan Thomas Navin Roger Noel John Norton Barry Ohlson Brent Olson Karen Onyeije Ronald Parver Robert Pepper Michael Perko Larry Povich Michael Powell Kelly Quinn Robert Ratcliffe Linda Ray John Rogovin Jessica Rosenworcel Jacquelynn Ruff Daniel Rumelt David Sappington William Scher James Schlichting Katherine Scinto Catherine Seidel Mark Seifert Linda Senecal Royce Sherlock Daniel Shiman Janet Sievert Louis Sigalos Jenifer Simpson James Smith K Dane Snowden David Solomon Thomas Spavins John Stanley Jerome Stanshine Jeffrey Steinberg Ann Stevens Donald Stockdale		
Thomas Navin Roger Noel John Norton Barry Ohlson Brent Olson Karen Onyeije Ronald Parver Robert Pepper Michael Perko Larry Povich Michael Powell Kelly Quinn Robert Ratcliffe Linda Ray John Rogovin Jessica Rosenworcel Jacquelynn Ruff Daniel Rumelt David Sappington William Scher James Schlichting Katherine Schroder Blaise Scinto Catherine Seidel Mark Seifert Linda Senecal Royce Sherlock Daniel Shiman Janet Sievert Louis Sigalos Jenifer Simpson James Smith K Dane Snowden David Solomon Thomas Spavins John Stanley Jerome Stanshine Jeffrey Steinberg Ann Stevens Donald Stockdale		
Roger Noel John Norton Barry Ohlson Brent Olson Karen Onyeije Ronald Parver Robert Pepper Michael Perko Larry Povich Michael Powell Kelly Quinn Robert Ratcliffe Linda Ray John Rogovin Jessica Rosenworcel Jacquelynn Ruff Daniel Rumelt David Sappington William Scher James Schlichting Katherine Schroder Blaise Scinto Catherine Seidel Mark Seifert Linda Senecal Royce Sherlock Daniel Shiman Janet Sievert Louis Sigalos Jenifer Simpson James Smith K Dane Snowden David Solomon Thomas Spavins John Stanley Jerome Stanshine Jeffrey Steinberg Ann Stevens Donald Stockdale		
John Norton Barry Ohlson Brent Olson Karen Onyeije Ronald Parver Robert Pepper Michael Perko Larry Povich Michael Powell Kelly Quinn Robert Ratcliffe Linda Ray John Rogovin Jessica Rosenworcel Jacquelynn Ruff Daniel Rumelt David Sappington William Scher James Schlichting Katherine Schroder Blaise Scinto Catherine Seidel Mark Seifert Linda Senecal Royce Sherlock Daniel Shiman Janet Sievert Louis Sigalos Jenifer Simpson James Smith K Dane Snowden David Solomon Thomas Spavins John Stanley Jerome Stanshine Jeffrey Steinberg Ann Stevens Donald Stockdale		
Barry Ohlson Brent Olson Karen Onyeije Ronald Parver Robert Pepper Michael Perko Larry Povich Michael Powell Kelly Quinn Robert Ratcliffe Linda Ray John Rogovin Jessica Rosenworcel Jacquelynn Ruff Daniel Rumelt David Sappington William Scher James Schlichting Katherine Schroder Blaise Scinto Catherine Seidel Mark Seifert Linda Senecal Royce Sherlock Daniel Shiman Janet Sievert Louis Sigalos Jenifer Simpson James Smith K Dane Snowden David Solomon Thomas Spavins John Stanley Jerome Stanshine Jeffrey Steinberg Ann Stevens Donald Stockdale		Noel
Brent Olson Karen Onyeije Ronald Parver Robert Pepper Michael Perko Larry Povich Michael Powell Kelly Quinn Robert Ratcliffe Linda Ray John Rogovin Jessica Rosenworcel Jacquelynn Ruff Daniel Rumelt David Sappington William Scher James Schlichting Katherine Schroder Blaise Scinto Catherine Seidel Mark Seifert Linda Senecal Royce Sherlock Daniel Shiman Janet Sievert Louis Sigalos Jenifer Simpson James Smith K Dane Snowden David Solomon Thomas Spavins John Stanley Jerome Stanshine Jeffrey Steinberg Ann Stevens Donald Stockdale		
Karen Onyeije Ronald Parver Robert Pepper Michael Perko Larry Povich Michael Powell Kelly Quinn Robert Ratcliffe Linda Ray John Rogovin Jessica Rosenworcel Jacquelynn Ruff Daniel Rumelt David Sappington William Scher James Schlichting Katherine Schroder Blaise Scinto Catherine Seidel Mark Seifert Linda Senecal Royce Sherlock Daniel Shiman Janet Sievert Louis Sigalos Jenifer Simpson James Smith K Dane Snowden David Solomon Thomas Spavins John Stanley Jerome Stevens Donald Stockdale		. 1
Ronald Parver Robert Pepper Michael Perko Larry Povich Michael Powell Kelly Quinn Robert Ratcliffe Linda Ray John Rogovin Jessica Rosenworcel Jacquelynn Ruff Daniel Rumelt David Sappington William Scher James Schlichting Katherine Schroder Blaise Scinto Catherine Seidel Mark Seifert Linda Senecal Royce Sherlock Daniel Shiman Janet Sievert Louis Sigalos Jenifer Simpson James Smith K Dane Snowden David Solomon Thomas Spavins John Stanley Jerome Stanshine Jeffrey Steinberg Ann Stevens Donald Stockdale		
Robert Pepper Michael Perko Larry Povich Michael Powell Kelly Quinn Robert Ratcliffe Linda Ray John Rogovin Jessica Rosenworcel Jacquelynn Ruff Daniel Rumelt David Sappington William Scher James Schlichting Katherine Schroder Blaise Scinto Catherine Seidel Mark Seifert Linda Senecal Royce Sherlock Daniel Shiman Janet Sievert Louis Sigalos Jenifer Simpson James Smith K Dane Snowden David Solomon Thomas Spavins John Stanley Jerome Stevens Jonald Stockdale	<u></u>	
Michael Perko Larry Povich Michael Powell Kelly Quinn Robert Ratcliffe Linda Ray John Rogovin Jessica Rosenworcel Jacquelynn Ruff Daniel Rumelt David Sappington William Scher James Schlichting Katherine Schroder Blaise Scinto Catherine Seidel Mark Seifert Linda Senecal Royce Sherlock Daniel Shiman Janet Sievert Louis Sigalos Jenifer Simpson James Smith K Dane Snowden David Solomon Thomas Spavins John Stanley Jerome Stanshine Jeffrey Steinberg Ann Stevens Donald Stockdale		
Larry Povich Michael Powell Kelly Quinn Robert Ratcliffe Linda Ray John Rogovin Jessica Rosenworcel Jacquelynn Ruff Daniel Rumelt David Sappington William Scher James Schlichting Katherine Schroder Blaise Scinto Catherine Seidel Mark Seifert Linda Senecal Royce Sherlock Daniel Shiman Janet Sievert Louis Sigalos Jenifer Simpson James Smith K Dane Snowden David Solomon Thomas Spavins John Stanley Jerome Stevens Donald Stockdale		
Michael Powell Kelly Quinn Robert Ratcliffe Linda Ray John Rogovin Jessica Rosenworcel Jacquelynn Ruff Daniel Rumelt David Sappington William Scher James Schlichting Katherine Schroder Blaise Scinto Catherine Seidel Mark Seifert Linda Senecal Royce Sherlock Daniel Shiman Janet Sievert Louis Sigalos Jenifer Simpson James Smith K Dane Snowden David Solomon Thomas Spavins John Stanley Jerome Stevens Donald Stockdale		1
Kelly Quinn Robert Ratcliffe Linda Ray John Rogovin Jessica Rosenworcel Jacquelynn Ruff Daniel Rumelt David Sappington William Scher James Schlichting Katherine Schroder Blaise Scinto Catherine Seidel Mark Seifert Linda Senecal Royce Sherlock Daniel Shiman Janet Sievert Louis Sigalos Jenifer Simpson James Smith K Dane Snowden David Solomon Thomas Spavins John Stanley Jerome Stevens Jonald Stockdale		_
Robert Ratcliffe Linda Ray John Rogovin Jessica Rosenworcel Jacquelynn Ruff Daniel Rumelt David Sappington William Scher James Schlichting Katherine Schroder Blaise Scinto Catherine Seidel Mark Seifert Linda Senecal Royce Sherlock Daniel Shiman Janet Sievert Louis Sigalos Jenifer Simpson James Smith K Dane Snowden David Solomon Thomas Spavins John Stanley Jerome Stanshine Jeffrey Steinberg Ann Stevens Donald Stockdale	L	 _
Linda Ray John Rogovin Jessica Rosenworcel Jacquelynn Ruff Daniel Rumelt David Sappington William Scher James Schlichting Katherine Schroder Blaise Scinto Catherine Seidel Mark Seifert Linda Senecal Royce Sherlock Daniel Shiman Janet Sievert Louis Sigalos Jenifer Simpson James Smith K Dane Snowden David Solomon Thomas Spavins John Stanley Jerome Steinberg Ann Stevens Donald Stockdale		
John Rogovin Jessica Rosenworcel Jacquelynn Ruff Daniel Rumelt David Sappington William Scher James Schlichting Katherine Schroder Blaise Scinto Catherine Seidel Mark Seifert Linda Senecal Royce Sherlock Daniel Shiman Janet Sievert Louis Sigalos Jenifer Simpson James Smith K Dane Snowden David Solomon Thomas Spavins John Stanley Jerome Stanshine Jeffrey Steinberg Ann Stevens Donald Stockdale		
Jessica Rosenworcel Jacquelynn Ruff Daniel Rumelt David Sappington William Scher James Schlichting Katherine Schroder Blaise Scinto Catherine Seidel Mark Seifert Linda Senecal Royce Sherlock Daniel Shiman Janet Sievert Louis Sigalos Jenifer Simpson James Smith K Dane Snowden David Solomon Thomas Spavins John Stanley Jerome Stanshine Jeffrey Steinberg Ann Stevens Donald Stockdale		
Jacquelynn Ruff Daniel Rumelt David Sappington William Scher James Schlichting Katherine Schroder Blaise Scinto Catherine Seidel Mark Seifert Linda Senecal Royce Sherlock Daniel Shiman Janet Sievert Louis Sigalos Jenifer Simpson James Smith K Dane Snowden David Solomon Thomas Spavins John Stanley Jerome Stanshine Jeffrey Steinberg Ann Stevens Donald Stockdale		
Daniel Rumelt David Sappington William Scher James Schlichting Katherine Schroder Blaise Scinto Catherine Seidel Mark Seifert Linda Senecal Royce Sherlock Daniel Shiman Janet Sievert Louis Sigalos Jenifer Simpson James Smith K Dane Snowden David Solomon Thomas Spavins John Stanley Jerome Stevens Donald Stockdale		
David Sappington William Scher James Schlichting Katherine Schroder Blaise Scinto Catherine Seidel Mark Seifert Linda Senecal Royce Sherlock Daniel Shiman Janet Sievert Louis Sigalos Jenifer Simpson James Smith K Dane Snowden David Solomon Thomas Spavins John Stanley Jerome Stevens Donald Stockdale		
William Scher James Schlichting Katherine Schroder Blaise Scinto Catherine Seidel Mark Seifert Linda Senecal Royce Sherlock Daniel Shiman Janet Sievert Louis Sigalos Jenifer Simpson James Smith K Dane Snowden David Solomon Thomas Spavins John Stanley Jerome Stevens Donald Stockdale		
James Schlichting Katherine Schroder Blaise Scinto Catherine Seidel Mark Seifert Linda Senecal Royce Sherlock Daniel Shiman Janet Sievert Louis Sigalos Jenifer Simpson James Smith K Dane Snowden David Solomon Thomas Spavins John Stanley Jerome Stanshine Jeffrey Steinberg Ann Stevens Donald Stockdale	L.	
Katherine Schroder Blaise Scinto Catherine Seidel Mark Seifert Linda Senecal Royce Sherlock Daniel Shiman Janet Sievert Louis Sigalos Jenifer Simpson James Smith K Dane Snowden David Solomon Thomas Spavins John Stanley Jerome Stanshine Jeffrey Steinberg Ann Stevens Donald Stockdale		
Blaise Scinto Catherine Seidel Mark Seifert Linda Senecal Royce Sherlock Daniel Shiman Janet Sievert Louis Sigalos Jenifer Simpson James Smith K Dane Snowden David Solomon Thomas Spavins John Stanley Jerome Steinberg Ann Stevens Donald Stockdale		
Catherine Seidel Mark Seifert Linda Senecal Royce Sherlock Daniel Shiman Janet Sievert Louis Sigalos Jenifer Simpson James Smith K Dane Snowden David Solomon Thomas Spavins John Stanley Jerome Stanshine Jeffrey Steinberg Ann Stevens Donald Stockdale		
Mark Seifert Linda Senecal Royce Sherlock Daniel Shiman Janet Sievert Louis Sigalos Jenifer Simpson James Smith K Dane Snowden David Solomon Thomas Spavins John Stanley Jerome Stanshine Jeffrey Steinberg Ann Stevens Donald Stockdale		
Linda Senecal Royce Sherlock Daniel Shiman Janet Sievert Louis Sigalos Jenifer Simpson James Smith K Dane Snowden David Solomon Thomas Spavins John Stanley Jerome Stanshine Jeffrey Steinberg Ann Stevens Donald Stockdale		
Royce Sherlock Daniel Shiman Janet Sievert Louis Sigalos Jenifer Simpson James Smith K Dane Snowden David Solomon Thomas Spavins John Stanley Jerome Stanshine Jeffrey Steinberg Ann Stevens Donald Stockdale		
Daniel Shiman Janet Sievert Louis Sigalos Jenifer Simpson James Smith K Dane Snowden David Solomon Thomas Spavins John Stanley Jerome Stanshine Jeffrey Steinberg Ann Stevens Donald Stockdale		L_
Janet Sievert Louis Sigalos Jenifer Simpson James Smith K Dane Snowden David Solomon Thomas Spavins John Stanley Jerome Stanshine Jeffrey Steinberg Ann Stevens Donald Stockdale		
Louis Sigalos Jenifer Simpson James Smith K Dane Snowden David Solomon Thomas Spavins John Stanley Jerome Stanshine Jeffrey Steinberg Ann Stevens Donald Stockdale		
Jenifer Simpson James Smith K Dane Snowden David Solomon Thomas Spavins John Stanley Jerome Stanshine Jeffrey Steinberg Ann Stevens Donald Stockdale		·
James Smith K Dane Snowden David Solomon Thomas Spavins John Stanley Jerome Stanshine Jeffrey Steinberg Ann Stevens Donald Stockdale		
K Dane Snowden David Solomon Thomas Spavins John Stanley Jerome Stanshine Jeffrey Steinberg Ann Stevens Donald Stockdale		
David Solomon Thomas Spavins John Stanley Jerome Stanshine Jeffrey Steinberg Ann Stevens Donald Stockdale		
Thomas Spavins John Stanley Jerome Stanshine Jeffrey Steinberg Ann Stevens Donald Stockdale		
John Stanley Jerome Stanshine Jeffrey Steinberg Ann Stevens Donald Stockdale		
Jerome Stanshine Jeffrey Steinberg Ann Stevens Donald Stockdale	Thomas	Spavins
Jerome Stanshine Jeffrey Steinberg Ann Stevens Donald Stockdale	John	Stanley
Jeffrey Steinberg Ann Stevens Donald Stockdale	Jerome	
Ann Stevens Donald Stockdale	Jeffrey	
Oonald Stockdale	<u>-</u>	
		
		

First Name	Last Name
Thomas	Sugrue
Joe!	Taubenblatt
Peter E	Tenhula
Henry	Thaggert
M Whiting	Thayer
Jef ⁺	Tobias
Bryan	Tramont
Mark	Uretsky
Lauren	Van Wazer
Gerald	Vaughan
Sharon	Webber
Maigaret	Weiner
Richard K	Welch
Sarah	Whitesell
Simon	Wilkie
Janice	Wise
Thomas	Wyatt
Peyton	Wynns
Cathy	Zima
Jack	Zinman
Susanna	Zwerling

۴-

Communications Workers of America AFL-CO-CLC

501 Third Street, N.W. Washington, D.C. 20001-2797 202/434-1110 Fax 202/434-1139 Morton Bahr President RECEIVED & INSPECTED
SEP 2 7 2002

FCC - MAILROOM



September 10, 2002

Dear Colleagues:

I have enclosed an important Economic Policy Institute report, *Putting Broadband on High Speed*, by Dr. Stephen Pociask. The report discusses the underlying economic and regulatory framework for our communications and information technology industry, which has lost more than 500,000 jobs in the past 18 months. More than 40,000 to 50,000 of those are union jobs.

This downturn impacts our entire economy. Investment in information technology accounted for one-quarter of the growth in gross domestic product in recent years.

It is imperative that policymakers take action to jumpstart the telecommunications and users by encouraging investment in broadband networks.

According to the enclosed report, 1.2 million new jobs would be created by full deployment of broadband networks. Widespread broadband deployment would create many social benefits, including telemedicine, economic development, job training, distance learning, public safety, and services for the disabled. Universal broadband deployment would result in \$500 billion in consumer welfare benefits.

But according to the EPI report, current regulation discourages investment in high speed Internet access technologies. Although cable, telephone, and wireless technologies are converging to provide broadband services, regulations have not kept page. Cable modern services are generally free of regulations, while telephone companies' high-speed DSL services are highly regulated.

The solution, according to the report, is symmetrical regulation of all broadband technologies to create a level playing field for competition and investment. A new regulators framework will unleash a new wave of investment in next-generation broadband networks and services.

The Communications Workers of America (CWA), the leading union representing workers in the telecommunications industry, looks forward to working with you to encourage policymakers to adopt the appropriate regulatory framework to checomoge universal, affordable deployment of broadband networks.

Sinceres

Morton Ba**hr** President

Ench some

